

REMARKS/ARGUMENTS

Applicant would like to thank the Examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office action, and the following comments are submitted for Examiner's consideration.

The Examiner has required a new title. The title has been amended appropriately herein.

Claims 1, 5, 7 and 9 were rejected under 35 U.S.C. 103 (a) over U.S. Patent No. 2001/0026260 to Yoneda et al. (hereinafter "Yoneda") in view of U.S. Patent No. 6,211,854 to Fujiyoshi (hereinafter "Fujiyoshi"). For the following reasons, the rejection is respectfully traversed.

The Office action acknowledges that Yoneda does not teach that a "display portion driving control unit changes the drive system so as to drive the display portion by sequential scanning when movie display is performed," as required by claim 1. Thus, Fujiyoshi was cited as rendering this limitation obvious. In support of the obviousness of applying the teaching of Fujiyoshi to those of Yoneda, the Examiner states that: "The suggestion/motivation would have been to provide the greatest possible power saving effects by drive-method switching." Applicants respectfully disagree. Fujiyoshi does not teach that using sequential scanning during movie display would achieve power savings. In fact, it teaches just the opposite. Fujiyoshi says that using *interlaced* scanning (called "reduction driving method" therein) reduces power use (see col. 1, lines 22-25). Fujiyoshi goes on to explain that the reason that the progressive (non-reduction) driving method must be used for displaying moving images is that the reduction (interlaced) method would cause defective elements such as lags and tailings to appear (see col. 1,

lines 25-30). Accordingly, there is no suggestion in Fujiyoshi that modifying the teachings of Yoneda to use sequential scanning when movie display is performed would result in power savings; clearly it would not. Moreover, Yoneda already teaches using interlaced scanning when displaying moving pictures, which according to Fujiyoshi uses less power than sequential scanning. Accordingly, contrary to the Office action, one of ordinary skill in the art would clearly not have been motivated to modify the teachings of Yoneda based on the teachings of Fujiyoshi in order to achieve power savings.

Moreover, one of ordinary skill will appreciate that Yoneda's interlaced scanning does not suffer from the problem of "defective elements such as lags and tailings" as described by Fujiyoshi, since Yoneda uses a special kind of liquid crystal. Further, as explained by Yoneda at paragraph [0021], its teachings relate to liquid crystal displays that have a memory effect (i.e. bistable liquid crystal exhibiting a cholesteric phase at room temperature) so that power is not required during static image display. However, as explained in paragraph [0010] of Yoneda, since writing to bistable liquid crystal takes significantly longer than writing on conventional TFT, it was previously considered unsuitable for displaying motion pictures. To solve this problem, Yoneda teaches that an *interlace* display is used when high-speed writing is needed (e.g. during motion picture display), which not only increases the refresh rate, but provides a more stable or flicker-free image since the memory effect of the liquid crystal causes the interlaced scan lines that are not being currently written to continue displaying (see paragraphs [0021] and [0022]). If the teachings of Yoneda were modified to select sequential scanning during motion picture display as described by Fujiyoshi, it would not only slow down the display, but it would completely defeat the flicker-reduction effect realized by Yoneda's invention. Moreover, as

described by Fujiyoshi at see col. 1, lines 22-25, interlaced scanning uses less power, so there would be no reason to modify Yoneda's teachings based on Fujiyoshi to include sequential scanning when displaying motion pictures. Accordingly, it is clear that neither Fujiyoshi's teachings related to power-reduction nor those relating to eliminating the display of defective elements would not have motivated one of ordinary skill to modify Yoneda to select sequential scanning when movie display is performed, as required by the present claims.

For all of the above reasons, the use of sequential scanning during movie display is not taught, suggested or otherwise rendered obvious by Yoneda in view of Fujiyoshi, as required by claim 1. Further, since claims 5, 7 and 9 each depend from claim 1, they are nonobvious for the same reasons. Accordingly, a *prima facie* case of obvious has not been established and the rejection should be withdrawn.

Claim 4 was rejected under 35 U.S.C. 103 (a) over Yoneda in view of Fujiyoshi and in further view of U.S. Patent Application Publication No. 2003/0013484 to Nishimura (hereinafter "Nishimura"). For the following reasons, the rejection is respectfully traversed. Claim 4 depends from claim 1. As described above, the claimed use of sequential scanning when a movie display is performed is nonobvious over Yoneda in view of Fujiyoshi. Nishimura does not overcome this deficiency. Therefore, even if the teachings of Yoneda, Fujiyoshi and Nishimura were combined, it would have been nonobvious to arrive at the claimed invention.

Claim 8 was rejected under 35 U.S.C. 103 (a) over Yoneda in view of Fujiyoshi and in further view of U.S. Patent Application Publication No. 2003/0137521 to Zehner (hereinafter "Zehner"). For the following reasons, the rejection is respectfully traversed. Claim 8 depends from claim 1. As described above, the claimed use of sequential scanning when a movie display

is performed is nonobvious over Yoneda in view of Fujiyoshi. Zehner does not overcome this deficiency. Therefore, even if the teachings of Yoneda, Fujiyoshi and Zehner were combined, it would have been nonobvious to arrive at the claimed invention.

Claim 10 was rejected under 35 U.S.C. 103 (a) over Yoneda in view of Fujiyoshi and in further view of U.S. Patent No. 6,307,681 to Aoki (hereinafter “Aoki”). For the following reasons, the rejection is respectfully traversed. Claim 10 depends from claim 1. As described above, the claimed use of sequential scanning when a movie display is performed is nonobvious over Yoneda in view of Fujiyoshi. Aoki does not overcome this deficiency. Therefore, even if the teachings of Yoneda, Fujiyoshi and Aoki were combined, it would have been nonobvious to arrive at the claimed invention.

In consideration of the foregoing analysis, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, the examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

Appl. No. 10/576,550
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If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No.: NGB-40221.

Respectfully submitted,

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